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| 1  | HEATHER E. WILLIAMS, #122664  |  |  |
|----|---|--|--|
| 2  | Federal Defender MEGAN T. HOPKINS, #294141 Assistant Federal Defender 801 I Street, 3 <sup>rd</sup> Floor |  |  |
| 3  |   |  |  |
| 4  | Sacramento, CA 95814<br>Tel: 916-498-5700/Fax: 916-498-5710   |  |  |
| 5  | Attorney for Defendant BRYAN PAUL TAMBLYN   |  |  |
| 6  | BRYAN PAUL TAMBLYN  |  |  |
| 7  | IN THE UNITED STATES DISTRICT COURT   |  |  |
| 8  | FOR THE EASTERN DISTRICT OF CALIFORNIA  |  |  |
| 9  |   |  |  |
| 10 | UNITED STATES OF AMERICA,   | ) Case No. 2:20-cr-00014-KJM   |  |
| 11 | Plaintiff,  | ) STIPULATION FOR TEMPORARY ) MODIFICATION OF CONDITIONS OF PRETRIAL |  |
| 12 | VS.   | ) RELEASE; ORDER   |  |
| 13 | BRYAN PAUL TAMBLYN,   | Hon. Kendall J. Newman   |  |
| 14 | Defendant.  | )<br>)   |  |
| 15 |   | )<br>)   |  |
| 16 | The defendant, BRYAN PAUL TAMBLYN, by and through his attorney of record,                                 |  |  |
| 17 | Assistant Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its                    |  |  |
| 18 | attorney of record, Christina McCall, hereby stipulate to and request an order from this Court            |  |  |
| 19 | temporarily modifying the conditions of Mr. Tamblyn's pretrial release to permit him to attend a          |  |  |
| 17 | 1.1   |  |  |

family gathering at his mother's home in Sacramento, CA, to celebrate the Easter holiday. The parties have conferred with Mr. Tamblyn's assigned pretrial services officer, who approves of this stipulated modification.

Mr. Tamblyn is currently on pretrial release in this district on a \$50,000 unsecured appearance bond, as well as an appearance bond secured by deeds of trust and co-signed by his uncle, Jerome Espinosa and grandfather, Richard Espinosa. See Dkt. 26 (unsecured appearance bond) and Dkt. 29 (appearance bond secured by deeds of trust). Additionally, Mr. Tamblyn has three (3) appointed third party custodians: Richard Espinosa, Sr., Jerome Espinosa, and Sheri Placencia.

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Mr. Tamblyn is in compliance with all of his conditions of release. One of those conditions of release is location monitoring. Mr. Tamblyn is subject to home detention, and therefore must remain inside his residence at all times except for employment; education; religious services; medical, substance abuse, or mental health treatment; attorney visits; court appearances; court ordered obligations; or other activities pre-approved by the pretrial services officer<sup>1</sup>.

Mr. Tamblyn requests, and the parties agree and so stipulate, that his Conditions of

Mr. Tamblyn requests, and the parties agree and so stipulate, that his Conditions of Release be temporarily amended to specifically permit him to attend a family gathering at his mother's home in Sacramento, CA. Mr. Tamblyn's mother is hosting a gathering of family members to celebrate Easter. The guests will include Mr. Tamblyn's parents, siblings, aunts and uncles, nieces and nephews. Any minors in attendance will be accompanied by their parents, whose names and contact information have been provided to the pretrial services officer.

Mr. Tamblyn's mother's home is (approximately) a 35-minute drive from Mr. Tamblyn's residence in Elk Grove, CA. Allowing some additional time for traffic and the time set aside for the day's festivities, the parties request a temporary modification of pretrial conditions to permit Mr. Tamblyn's release from the monitor between 12:30 p.m. and 7:30 p.m. on Sunday, April 4, 2021. Mr. Tamblyn will be in the company of at least two third party custodians and multiple sureties at his mother's home. Mr. Tamblyn will drive directly to his mother's home from his residence and will immediately return to his residence at the conclusion of the gathering.

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<sup>1</sup> Pretrial services interprets this condition to only permit their approval of other activities which are deemed essential, with all other activities requiring the approval of the Court. The pretrial services officer who supervises Mr. Tamblyn advised defense counsel that this specific request should be submitted to the Court for approval, in the form of a stipulation by the parties.

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| 1  | The proposed temporarily amended condition is attached to this request. The parties do |   |
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| 2  | not request a hearing in this matter in light of this stipulation.                     |   |
| 3  |  |   |
| 4  |  | Respectfully submitted,                           |
| 5  | DATED: March 31, 2021  | HEATHER E. WILLIAMS                               |
| 6  |  | Federal Defender                                  |
| 7  |  | /s/ Megan T. Hopkins                              |
| 8  |  | MEGAN T. HOPKINS<br>Assistant Federal Defender    |
| 9  |  | Attorney for BRYAN PAUL TAMBLYN                   |
| 10 |  |   |
| 11 | DATED: March 31, 2021  | PHILLIP TALBERT                                   |
| 12 |  | Acting United States Attorney                     |
| 13 |  | /s/ Christina McCall                              |
| 14 |  | CHRISTINA MCCALL Assistant United States Attorney |
| 15 |  | Attorney for the United States                    |
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## **ORDER**

GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT the Special Conditions of Release for defendant, Bryan Paul Tamblyn, be Temporarily Amended such that the he is permitted to attend a family gathering in celebration of the Easter holiday at his mother's home in Sacramento, CA between the hours of 12:30 p.m. and 7:30 p.m. on Sunday, April 4, 2021. Mr. Tamblyn shall travel directly to and from the event and shall be in the presence of a third party custodian for the entire time he is at the gathering. Mr. Tamblyn shall not be in the presence of any juveniles or minors unless that juvenile or minor's parent or guardian is also present. All other conditions of pretrial release shall remain in force.

The Temporary Amended Special Condition of Release is hereby adopted.

Dated: March 31, 2021

ENDALL J. NEWMAN

UNITED STATES MAGISTRATE JUDGE